

## EXHIBIT C

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

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CAR-FRESHNER CORPORATION and JULIUS  
SÄMANN LTD.,

Plaintiffs,

Civil Action No.:  
5:17-cv-171 (TJM/ATB)

v.

AMERICAN COVERS, LLC f/k/a AMERICAN  
COVERS, INC. d/b/a HANDSTANDS, ENERGIZER  
HOLDINGS, INC., and ENERGIZER BRANDS, LLC,

Defendants.

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**PLAINTIFFS' AMENDED RESPONSES  
AND OBJECTIONS TO DEFENDANTS'  
FIRST REQUEST FOR THE PRODUCTION  
OF DOCUMENTS AND THINGS**

Plaintiffs CAR-FRESHNER Corporation and Julius Sämann Ltd. (collectively "Plaintiffs") hereby amend their responses to the First Set of Requests for Production of Documents and Things, propounded by Defendants American Covers, LLC f/k/a American Covers, Inc. d/b/a Handstands, Energizer Holdings, Inc., and Energizer Brands, LLC ("Defendants"), as follows:

**GENERAL OBJECTIONS**

Plaintiffs' responses to Defendants' First Request for the Production of Documents and Things are subject to the following general and continuing objections:

A. The following responses and objections are based upon facts and information now known to Plaintiffs as well as their present analysis of the case, and may not in any way be deemed to be an admission or representation that

of annual sales totals for goods sold under Plaintiffs' Marks, in units, for 2013-2017, and a retail scan data report for the period ending December 17, 2016.

**REQUEST NO. 47.** Documents sufficient to identify the target or typical end users of each of Plaintiffs' Goods sold or offered for sale under Plaintiffs' Marks, including documents sufficient to identify their demographic characteristics (e.g., age, gender, race, income), psychographic characteristics (e.g., buyer preferences), or business characteristics (e.g., category size, purpose for use of Plaintiffs' Goods).

**RESPONSE TO REQUEST NO. 47:** Plaintiffs object that this request is vague, ambiguous, unduly burdensome, and seeks discovery that is not relevant or proportional to the needs of the case. Plaintiffs refer Defendants to Plaintiffs' response to Defendants' Interrogatory Number 10.

**REQUEST NO. 48.** Documents that constitute, refer, or relate to any market research (including consumer surveys, focus groups, polls, interviews, tracking studies, etc.) concerning Plaintiffs' Marks, Plaintiffs' Goods, or Plaintiffs' customers for Plaintiffs' Goods.

**RESPONSE TO REQUEST NO. 48:** Plaintiffs object that this request is vague, ambiguous, unduly burdensome, and seeks discovery that is not relevant or proportional to the needs of the case. Plaintiffs reserve the right to assert the attorney-client privilege, the work product doctrine or any other applicable privilege or protection should any further response to this request (or any of Defendants' requests) be required.

**REQUEST NO. 49.** Documents that constitute, refer, or relate to any market research (including consumer surveys, focus groups, polls, interviews, tracking studies, etc.) concerning Defendants, Defendants' goods, or Defendants' marks.

**RESPONSE TO REQUEST NO. 49:** Plaintiffs object that this request is vague, ambiguous, unduly burdensome, and seeks discovery that is not relevant or proportional to the needs of the case. Plaintiffs reserve the right to assert the

RESPONSE TO REQUEST NO. 89: Plaintiffs object that this request calls for expert witness disclosure in a manner and at a time not required or authorized by any applicable rule or Court order. Plaintiffs reserve the right to assert the attorney-client privilege, the work product doctrine, or any other applicable privilege or protection should any further response be required.

Dated: September 18, 2017

BOND SCHOENECK & KING, PLLC

By: Liza R. Magley

Louis Orbach (587815)

Liza R. Magley (519849)

One Lincoln Center

Syracuse, NY 13202

Telephone: (315) 218-8000

Email: lorbach@bsk.com

Email: lmagley@bsk.com

*Attorneys for Plaintiffs,*

*CAR-FRESHNER Corporation and Julius*

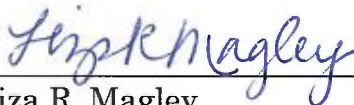
*Sämann Ltd.*

CERTIFICATE OF SERVICE

I certify that on the 18th day of September, 2017 a true and correct copy of Plaintiffs' Amended Responses and Objections to Defendants' First Request for the Production of Documents and Things was served upon the following counsel via Email and First Class Mail addressed as follows:

William H. Brewster, Esq.  
Jennifer Fairbairn Deal, Esq.  
Kilpatrick Townsend & Stockton LLP  
1100 Peachtree Street NE, Suite 2800  
Atlanta, GA 30309-4528  
Telephone: (404) 815-6500  
Email: [bbrewster@kilpatricktownsend.com](mailto:bbrewster@kilpatricktownsend.com)  
Email: [jdeal@kilpatricktownsend.com](mailto:jdeal@kilpatricktownsend.com)

*Counsel for Defendants*

  
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Liza R. Magley